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**Subject:** NW Natural, HC&C System Status  
**Date:** Friday, December 30, 2016 12:52:39 PM  
**Attachments:** [20161230-DEQ Letter-HCC System Status.pdf](#)

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Good afternoon Bob.

The attached letter provides DEQ's determination regarding the operational status of the Hydraulic Containment and Control (HC&C) system. The primary purpose of the letter is to inform NW Natural that DEQ considers HC&C system commissioning to be complete. Data needed to evaluate system performance and establish operational parameters and protocols, and an operation and maintenance (O&M) schedule, have been collected. Consequently, NW Natural is no longer in a testing phase or commissioning mode. DEQ considers the HC&C system to be operational. EPA concurs with DEQ's determination.

Given the transition from commissioning to an operational status, the letter revises timeframes for routine reporting hydraulic data and treatment system residual sampling and analytical results going forward.

The letter also presents DEQ's path forward for completing the plans necessary to ensure the system's long-term operation, performance, effectiveness, and the management of contaminated media and water treatment system residuals. Finalizing system plans involves:

- Incorporating information and data collected during system commissioning into the:
  - "Hydraulic Control and Containment System Capture Performance and Monitoring Plan – NW Natural Gasco Site," dated May 1, 2015 (HC&C System PMP);
  - "Hydraulic Control and Containment System Operations and Maintenance Manual, NW Natural Gasco Site," dated May 1, 2015 (HC&C System O&M Plan); and
  - "Contaminated Materials Management Plan – NW Natural Gasco Site," dated February 23, 2016 (Gasco Site CMMP).
- DEQ and EPA review and approval of the HC&C System PMP and HC&C System O&M Plan, and DEQ approval of the Gasco Site CMMP.

The letter discusses general plan revisions and DEQ's projected timeframes for providing comments.

DEQ acknowledges the transition from system commissioning to an operational mode represents an important milestone for groundwater source control along the shoreline of the Gasco Site and northern Siltronic facility. DEQ also appreciates the ongoing work NW Natural is conducting to monitor and operate the system. We're looking forward to finalizing the system plans.

Please feel free to call me with questions regarding the attachment and best to you for a Happy New

Year.

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